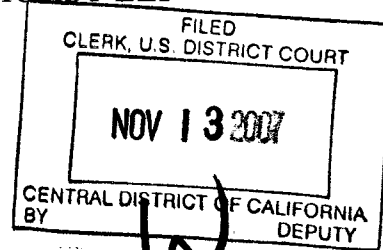


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Attorneys for Defendant Coast Capital
Partners, LLC



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

ALBERT M. ZLOTNICK, an individual,

Plaintiff,

vs.

COAST CAPITAL PARTNERS, LLC,
and Does 1 through 50, inclusive,

Defendants.

Case No. CV07-783R(JTLx)

Hon. Manuel L. Real

**~~PROPOSED~~ ORDER GRANTING
DEFENDANT CCP'S MOTION FOR
SANCTIONS PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 11**

Date: November 5, 2007

Courtroom: 8

LODGED

2007 NOV -8 PM 3:28
CLERK, U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY

1 On November 5, 2007, the Court held a hearing on Coast Capital Partners,
2 LLC's ("CCP's") Motion for Sanctions Pursuant to Federal Rule of Civil Procedure
3 11 ("Motion"). The Motion sought sanctions in the amount of some or all of CCP's
4 attorneys' fees against plaintiff Albert M. Zlotnick, Zlotnick's counsel Louis Altman,
5 and the law firm Taubman, Simpson, Young & Sulentor, P.C.

6 THE COURT, having considered the Motion and the supporting papers and
7 evidence filed in connection therewith, Plaintiff Albert M. Zlotnick's and his
8 counsel's Opposition thereto and the supporting papers filed therewith, the *ex parte*
9 application of the law firm Taubman, Simpson, Young & Sulentor, P.C. and the
10 supporting papers filed therewith, and CCP's Reply and the supporting papers filed
11 therewith; all parties having been given notice and an opportunity to be heard; and
12 GOOD CAUSE appearing therefor;

13 HEREBY FINDS THAT:

14 1. Plaintiff Albert M. Zlotnick and his counsel Louis Altman (and not
15 Taubman, Simpson, Young & Sulentor, P.C.) violated Federal Rule of Civil
16 Procedure 11(b)(3) and 11(b)(1), and each are jointly and severally responsible for
17 the violations.

18 2. Pursuant to Federal Rule of Civil Procedure 11(c)(3), the Court finds
19 that the prior pleadings and testimony from plaintiff's prior actions against third
20 parties demonstrate that both Albert M. Zlotnick and his counsel at all material times
21 were aware, or after a reasonable inquiry should have become aware, that all of
22 plaintiff's causes of action accrued well before the time of discovery alleged and that
23 all of plaintiff's claims were time-barred as a result. For this and other reasons stated
24 on the record, the Court finds that the alleged fact of late discovery in plaintiff's
25 Complaint and subsequent filings was not supportable by the evidence and that the
26 action was brought for an improper purpose.

27 3. Pursuant to Federal Rule of Civil Procedure 11(c)(2), the Court further
28 finds that a portion of CCP's attorneys' fees and costs in the amount of \$144,700.93

1 were incurred as a direct result of the violations noted above, that this amount in
2 sanctions is sufficient to deter repetition of such conduct or comparable conduct by
3 others similarly situated, and that this amount in sanctions is warranted for effective
4 deterrence under the circumstances.

5 AND HEREBY ORDERS THAT:

6 1. Plaintiff Albert M. Zlotnick and his counsel Louis Altman are ordered,
7 jointly and severally, to pay to CCP sanctions in the amount of \$144,700.93.

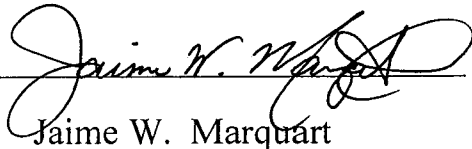
8
9 Dated: Nov. 13, 2007


HON. MANUEL L. REAL

1 Respectfully submitted:

2 BAKER MARQUART CRONE &
3 HAWXHURST LLP

4 By



5
6 Jaime W. Marquart
7 Attorneys for Defendant
8 Coast Capital Partners, LLC

9 Dated: November 8, 2007

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10990 Wilshire Blvd., Fourth Floor, Los Angeles, California 90024.

On November 8, 2007, I served true copies of the foregoing document described as

[PROPOSED] ORDER GRANTING DEFENDANT CCP'S MOTION FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 11

on the parties in this action as follows:

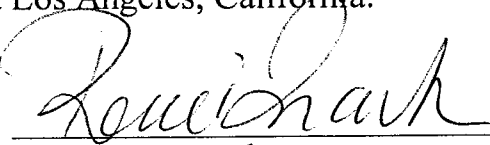
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Long Beach, CA 90802
Ph: 562-435-3456
Fx: 562-435-6335

Louis H. Altman, Esq.
TAUBMAN, SIMPSON, YOUNG & SULENTOR
One World Trade Center, Suite 400
Long Beach, CA 90831
Ph: 562-436-9201
Fx: 562-590-9695

BY MAIL: I enclosed the foregoing into sealed envelope addressed as shown above, and I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 8, 2007, at Los Angeles, California.



Renee M. Travlos